



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PESTICIDE PROGRAMS

January 4, 2000

MEMORANDUM

SUBJECT: Response to Registrant's Error Comments on the Preliminary Risk Assessment for Mevinphos

FROM: Joseph Nevola, Chemical Review Manager
Special Review and Reregistration Division (7508C)

TO: Mevinphos Public Docket

The registrant for the organophosphate insecticide mevinphos, AMVAC Chemical Corporation, submitted comments as requested by the Agency in a letter dated December 7, 1999. AMVAC was provided 30 days to review and make comments on mathematical, computational, typographic and similar errors. AMVAC comments did not specify mathematical, computational, or typographical errors. AMVAC submitted comments on issues regarding the studies and data used to support the risk assessment. Therefore, the Agency will address these non-error comments after the official 60-day public comment period.

Comments made by the registrant were outside the scope of "error correction," and related to formulations, use rates, PHIs, data requirements, study submissions, and risk assessment assumptions. AMVAC only mentioned use rates and PHIs by way of explaining that they have not yet accomplished Mexican label changes to match use rates and PHIs used in Mexican field trials due to legal complications regarding the transfer of the Mexican label from the current registrant to AMVAC. However, AMVAC reported that two studies were previously submitted, possibly in 1994. Yet, AMVAC could not provide the MRID numbers. The Agency could not verify receipt of the two studies. For identification purposes, in a letter dated December 7, 1999, AMVAC supplied the titles and courtesy copies or volume samples of the two studies; a "Subchronic Neurotoxicity study of Mevinphos in Rats", containing text and summary data, without individual animal data and a "Magnitude of Mevinphos Residues in Grapes for Processing" study. Neither study nor any record or MRID number of those two studies was found at EPA. In late December, 1999, AMVAC agreed by telephone to submit three complete copies of each study to the Agency and a follow-up letter dated January 4, 2000 was sent by EPA to AMVAC. If changes to the risk assumptions used are appropriate, the changes will be made when the Agency revises the preliminary risk assessment subsequent to the 60-day public comment period.